

EXHIBIT D

WILLIAM HANSON,

1 Merchandising. We have tasks, whether it
2 be your PDA or faxed paperwork, we go
3 there and we do a job and we are done.

4 And that's how it goes for
5 all vendors, because I did five Lowe's
6 stores and five Depots, and the way she
7 made it work, whether it was between
8 Steve, Jeff or myself, she micromanaged.
9 She made sure, not only that she was --
10 I'm not going to say confronting them in
11 that department, but she made sure her
12 presence was known, and she would let
13 that be known either by her being in that
14 department where they were at
15 face-to-face or by simply just having
16 someone go to them and saying, Yvette
17 wants you to do this, this, this and
18 that.

19 Q. And that was during the time
20 that they were vendors?

21 A. Correct.

22 Q. Okay. Anybody else that you
23 remember who quit working for Lowe's
24 during the time that you were a vendor

WILLIAM HANSON,

1 there because they didn't like Yvette?

2 A. There's been a lot of
3 people. Another guy -- see, this goes
4 back -- I'm not going to associate faces,
5 but this goes back about five -- well,
6 it's a vendor, about two -- two years ago
7 as a vendor, about five years when I quit
8 for Lowe's.

9 Again, the guy -- it's a
10 different Mike, not the same Mike that I
11 told you about, but this Mike, too, was
12 also in plumbing. There is, I guess, two
13 Mikes.

14 Q. What happened with this Mike
15 in plumbing?

16 A. He just was -- uhm, he just
17 felt that Yvette wasn't working with him
18 as far as scheduling.

19 Q. So he quit?

20 A. He quit.

21 Q. And was he having the same
22 kind of problems you were having with
23 Yvette?

24 A. I think he dealt -- not

WILLIAM HANSON,

1 A. No, sir.

2 Q. Okay. What did you do after
3 you were laid off from Spectrum?

4 A. I went to Ideal
5 Merchandising.

6 Q. How soon after you left
7 Spectrum did you go to Ideal?

8 A. One month.

9 Q. Do you remember when that
10 was?

11 A. I don't remember the date,
12 but it was in October of 2003.

13 Q. Okay. How did you find out
14 about a job at Ideal?

15 A. That's an interesting
16 question. Uhm, actually, you would think
17 that I would have found out, uhm, through
18 word of mouth, but, uhm, actually, it was
19 advertised on NARMS dot com.

20 Q. NARMS?

21 A. NARMS.

22 Q. NARMS?

23 A. NARMS, it's a search engine
24 for vendor management. Actually, all

WILLIAM HANSON,

1 aisle on what I would exactly be doing
2 with Ideal Merchandising. He did
3 plumbing and electrical.

4 And I was surprised, he
5 expedited everything that day. He said
6 if I was interested that, uhm, I could
7 start, I think he said, like next week or
8 something like that. I might have
9 started the next week, but he pretty much
10 said I could start at the time that he
11 had offered and so I took that offer.

12 Q. So he offered you the job on
13 that same day?

14 A. Yes, sir.

15 Q. And you accepted it that
16 same day?

17 A. Yes, sir.

18 Q. What was the title of your
19 position there?

20 A. Merchandiser.

21 Q. Who did you report to?

22 A. Jeremy Leaman.

23 Q. Did you report to him for
24 the entire time that you worked for

WILLIAM HANSON,

1 Ideal?

2 A. Yes, sir. On a footnote, we
3 would have Ideal Merchandising -- like
4 when I did work, whether I would be --
5 like one day I would do plumbing, one day
6 electrical, I would have that department
7 manager sign off, not necessarily
8 reporting to him or her, per se, but they
9 would sign off on my PDA or paperwork.

10 Q. I'm sorry, what was the
11 first term you used?

12 A. PDA.

13 Q. What does that stand for?

14 A. That's a -- a -- wow, that's
15 a --

16 MS. CLEMONS: Personal
17 digital assistant.

18 THE WITNESS: Thank you. I
19 couldn't even think. Thank you.
20 That's what it is.

21 BY MR. LEAHY:

22 Q. Personal digital assistant?

23 A. Yes, sir.

24 Q. So if you worked in the

WILLIAM HANSON,

1 call on a daily basis, like wanting to
2 know what was going on and stuff.

3 Q. Okay. So what were your
4 responsibilities as merchandiser?

5 A. I loved it, actually, even
6 though it was -- it wasn't the glorified
7 role I had before as market sales
8 manager, I loved what I did because I did
9 what the Lowe's employees wouldn't do or
10 too often. I would be responsible for
11 marketing, which is basically -- I had
12 everything.

13 Any type of display, I was
14 responsible to make sure the display was
15 clean, was colorful, was, you know --
16 just basically sold the merchandise. I
17 was also responsible for the beams to be
18 painted the Lowe's color, which is like a
19 -- well, the beam color is a certain kind
20 of gray. There's different gray
21 schematics, but it was the Lowe's color
22 gray, so I was responsible to make sure
23 that the beams were flush gray.

24 Q. What do you mean by "beams"?

WILLIAM HANSON,

1 A. Beams are the beams that
2 hold the product -- I shouldn't say that,
3 actually, the overlay, which is like the
4 wood that goes -- the wood that's
5 underneath the product. These beams hold
6 the -- they are like part of the shelf
7 unit. These beams hold the wooden slab
8 that holds the product, so they're
9 support units.

10 Q. Okay.

11 A. So all I did was basically
12 make a lot of bench stickers, small
13 stickers, beam stickers, a little bit
14 bigger stickers where the price is. As
15 part of my job, it was to make sure the
16 prices were accurate, make sure the
17 stickers were flush and they were not
18 torn off or scratched, that everything
19 was where it was supposed to be, product
20 was supposed to be where that item number
21 was.

22 And, uhm, to go along with
23 that, the whole schematics of that bay
24 was my overseeing, making sure, like I

WILLIAM HANSON,

1 said, the display was perfect, making
2 sure the brochures was fully stocked with
3 brochures, the beam was a Lowe's color
4 gray, nice color, the stickers were brand
5 new. I also had to do the stocking, too,
6 to make sure everything was brought down
7 in order.

8 I liked doing it, to be
9 honest with you.

10 Q. Were there specific products
11 that were responsible for working for
12 Ideal?

13 A. Yeah, I oversee like
14 electrical and GE and Buss -- like GE,
15 the brand, Buss, B-u-s-s, the brand,
16 dealing with the fuses and the electrical
17 plumbing, American Valve, uhm, and all
18 the PVC pipes, pretty much everything --
19 all the small components pretty much in
20 plumbing. Quest, the copper, black iron.
21 I mean, I did everything. I did a lot of
22 the smaller units in plumbing and
23 electrical.

24 Q. Okay. And which stores did

WILLIAM HANSON,

1 you work in?

2 A. Middletown and Dover.

3 Q. Just those two?

4 A. Yes, sir.

5 Q. How often would you be at
6 each store?

7 A. The way my -- my district
8 manager, Jeremy Leaman, had it set up,
9 two days in Middletown, two days in
10 Dover.

11 Q. Okay. And then what would
12 you do the next day, just continue to
13 rotate?

14 A. Actually, it was kind of
15 weird. Monday and Tuesday would be
16 Middletown, Wednesday I would have off,
17 Thursday and Friday I would have Dover.

18 Q. Okay.

19 A. Weekends off.

20 Q. Okay. So you worked four
21 days a week?

22 A. Yes, sir.

23 Q. How many hours a day did you
24 work?

WILLIAM HANSON,

1 Q. Okay. So Paul was there and
2 then he left while you were there?

3 A. Yes, sir.

4 Q. Okay. Let me ask you to
5 take a look at paragraph 14.

6 A. Yes.

7 Q. It says, during the period
8 of his employment, plaintiff was
9 subjected to constant harassment by
10 agents of defendant, Lowe's; namely,
11 store manager Yvette, and I take it you
12 mean Yvette Schreiber?

13 A. Yes, sir.

14 Q. A white American female and
15 assistant store manager, Linda Myer, I
16 think you mean Linda Myers, also a white
17 American female?

18 A. Yes, sir.

19 Q. Okay. What kind of
20 harassment were you subjected to by
21 Yvette Schreiber during the time that you
22 worked for Ideal?

23 A. The main case is when I was
24 -- I mean, this is just -- I mean, I just

WILLIAM HANSON,

1 never expected I would go through this
2 with a store manager or any professional,
3 but supposed to be a professional, but I
4 was in the electrical department doing
5 the switch covers, I mean, it's -- the
6 work can be tedious. Pretty much all the
7 cover plates have brass, plastic, so on
8 and so forth. That is all I was doing
9 that day, not necessarily doing cycle
10 counts or inventory, just making
11 everything look good, because those boxes
12 are small and they get messed up and they
13 are in little plastic sleeves. It's one
14 of the hardest things to do, but I pretty
15 much just made sure all the plates were
16 in the right place and just -- basically
17 just trying to make it look good.

18 It's hard when you are
19 dealing with small components, but in a
20 nutshell -- and I -- I had two shopping
21 carts full of boxes, and I was
22 consistently working in that aisle, and I
23 usually stay in that aisle for a couple
24 of hours. And she goes by, and to put a

WILLIAM HANSON,

1 damper on my day, she goes, this -- this
2 section looks like shit, excuse my
3 language. That's what she said verbatim,
4 this section looks like shit, you need to
5 do a better job, not even saying a hi,
6 not even saying what are you doing or
7 anything, and then she left.

8 Q. How did the section look?

9 A. Average. I will say that on
10 a footnote, because it's not like there
11 was boxes all the over the place. The
12 boxes I had were in my two shopping
13 carts, and that aisle is never a hundred
14 percent, but I assure you, it was a lot
15 better looking than the day before.

16 Q. So she wasn't happy with the
17 way it looked?

18 A. She wasn't happy with the
19 way it looked.

20 Q. Okay. Did anybody witness
21 that?

22 A. He probably won't fess(sic)
23 to it, but Keith Dominick.

24 Q. What do you mean by "he

WILLIAM HANSON,

1 half Korean?

2 A. Yes, sir.

3 Q. Was that the only time you
4 ever discussed your race or national
5 origin with Linda Myers?

6 A. I don't -- that was the only
7 time because we never talked about it
8 again.

9 Q. Yvette you never discussed
10 it with?

11 A. No, sir.

12 Q. We were talking about the
13 harassment that you claim Yvette
14 Schreiber subjected you to, and the first
15 one you gave me was she walked past the
16 section you were in and said, this
17 section looks like shit. What other ways
18 did she subject you to harassment?

19 A. The very first day.

20 Q. What do you mean "by the
21 very first day," your first day with
22 Ideal?

23 A. Yes, sir. I was at the
24 Dover store and, uhm, the labels -- the

WILLIAM HANSON,

1 beams needed to be painted the Lowe's
2 color gray. I mean, they were just all
3 scratched up from a cherry picker, which
4 is a form of a forklift, that goes by for
5 stocking way up high. It's like an
6 elevator. And there was a lot of
7 scratches and scuffs on it.

8 So I asked the department
9 manager if they had any paint, and he
10 said no, that I would have to get it
11 billed out. So I went to Keith Dominick,
12 he's the gentleman that referred Jeremy
13 Leaman, I shouldn't say refer, but Jeremy
14 Leaman did approach him on my background,
15 and he's the one that gave him the nod to
16 say okay.

17 Well, he happened to be in
18 the store that day and I asked him, hey,
19 this is what I am doing, I got to paint
20 all the beams and electrical, and can I
21 please get this paint and brush and
22 everything billed out, which basically
23 means the store pays for it, which I have
24 done it many times with Spectrum and done

WILLIAM HANSON,

1 it as a Lowe's employee. It's really not
2 a big problem at all.

3 So I got everything done,
4 got the paint mixed, got the supplies to
5 paint the beams with, and I brought it to
6 the customer service desk, but you can't
7 just take everything and paint it. I
8 have to give it to customer service desk
9 and scan everything and bill it out.
10 There's a specific way to do that that
11 shows it hasn't been paid for, it is paid
12 for by the store.

13 The only person that could
14 help me at the time was Yvette. There
15 was no other person. So I'm trying to
16 get the job done. So I asked Yvette, and
17 I said, Yvette, can I please get this
18 billed out?

19 She goes, why?

20 I explained to her what
21 needed to be done. I'm not trying to
22 repeat myself, but the beams needed to be
23 repainted because they were scuffed up
24 from the cherry pickers and the shopping

WILLIAM HANSON,

1 carts and everything, and she goes, no,
2 you pay for that.

3 And I said, Yvette, Keith
4 just approved this to be billed out. He
5 said it could be billed out.

6 She goes no, no, you want to
7 paint it, you pay for it.

8 And I said, Yvette, call
9 Keith, please. He will tell you that he
10 said that.

11 She goes, I don't believe
12 you.

13 I said, if you don't believe
14 me, fine, just call him, believe him.

15 She couldn't get in touch
16 with him right away, so it's probably
17 about -- I mean, this was over 20 minutes
18 she made me wait there. Then he finally
19 got to the customer service desk. It was
20 simple. Yeah, I did, I told him he could
21 bill it out. It's no problem.

22 Then Yvette just looks at
23 him like, are you sure? Keith is like
24 yeah, he looked at -- looks at Yvette and

WILLIAM HANSON,

1 was befuddled by it, like why is this
2 such a big deal, and going back to what I
3 was saying, it's not really a big deal
4 because I have had equipment, paint,
5 tools billed out as a Lowe's employee and
6 as the previous vendor. It's not a big
7 deal. It's not. She made a big deal out
8 of it. So I had to go through all that
9 just to get the -- just trying -- I am
10 just trying to make the beam look good.
11 I mean, I'm doing her a service and she
12 is just making my -- making it really
13 difficult for me. So I had to go through
14 all that to get it -- you know, to get --
15 to paint the beams.

16 Q. Did you get your paint?

17 A. I got the paint, but I had
18 to go -- I didn't feel as if I had to go
19 through all that just to get the paint.

20 Q. So you had to wait a few
21 minutes to get the paint?

22 A. I had to wait over 20
23 minutes. At least half an hour.

24 Q. And then you got the paint?

WILLIAM HANSON,

1 A. Then I got the paint.

2 Q. And you painted the beams?

3 A. I painted the beams.

4 Q. Okay. What else did Linda
5 Myers -- sorry, Yvette Schreiber do that
6 you considered harassing?

7 A. One time, and this is just
8 one time, I didn't have my vendor vest
9 on, and usually it's not a problem as
10 long as you had like a company shirt logo
11 and that shows the ID color or emblem
12 that you work for that company, then that
13 would suffice.

14 At one time I didn't have my
15 vest on. She called me from -- she
16 called me from quite a ways, at least
17 fifty or more yards, and saying, Mr.
18 Hanson, what are you doing, like just
19 really loud. Mr. Hanson, what are you
20 doing? And she wasn't exactly telling
21 me, but she said it in a way to where I
22 would have to go all the way to the
23 customer service desk and find out why.

24 So I went up to the customer

WILLIAM HANSON,

1 service desk and I asked her what's
2 wrong.

3 She said, where is -- where
4 is your vest at?

5 I said Yvette, I do
6 apologize, I didn't have it with me, I
7 left it at home and it's in the laundry,
8 and then I didn't get a chance for it to
9 dry.

10 She goes, you can't work in
11 my store unless you wear a vest.

12 And I said, Yvette, I said,
13 can I just -- and I borrowed one in Bear
14 or Wilmington, I borrowed vests before,
15 and it's not a problem. They will loan
16 you one. I said, do you have one that I
17 could borrow for the day?

18 She goes, no, you're going
19 to buy one.

20 I said, how much is it?

21 And she said like 20 bucks
22 or -- it seemed like it was a little bit
23 too high, and don't quote me on that, but
24 it was real expensive.

WILLIAM HANSON,

1 I said, that's a lot of
2 money.

3 She goes, well, you got to
4 leave my store.

5 I said, how about this -- I
6 didn't want to disappoint Jeremy. I said
7 how about this, how about I just get it
8 out, just finish drying it up and I will
9 come back.

10 And she goes, if you let it
11 happen again, I don't want you back in my
12 store.

13 And I was like, okay.

14 Q. So what did you do?

15 A. I left. I went -- had the
16 vest go through the dryer, the vendor
17 vest went through the dryer, and I came
18 back and finished up my day.

19 Q. So you went home and dried
20 it, put your vest on and came back?

21 A. Yes, sir.

22 Q. Didn't Jeremy Leaman give
23 you more than one vest?

24 A. Yes, he did, but I lost the

WILLIAM HANSON,

1 other vest. I didn't know where it was
2 at. I think I left it in the Middletown
3 store, but I wasn't able to recover it.

4 Q. Were you supposed to wear
5 your vest when you worked in the Lowe's
6 store?

7 A. That's a good idea, to wear
8 the vest, because it's a vest that says
9 vendor on the back, so that way customers
10 could differentiate the difference
11 between a vendor and an employee, because
12 most of the customers will see that, and
13 not to say they will go there and leave
14 you alone, but if they know they have to
15 ask you a question, they will know they
16 are better off going to a Lowe's
17 employee, and it gives us a better chance
18 to get our jobs done as far as inventory.

19 Q. So there's a reason for you
20 to wear the vest?

21 A. Yeah.

22 Q. It's pretty important for
23 you to wear it?

24 A. I am for it. It could also

WILLIAM HANSON,

1 deal with theft. I mean, you want to
2 know who is working in your store,
3 especially with vendors. If you have
4 someone without a vest, you will be
5 like -- it's not a customer, you know,
6 who is it, so -- so for security reasons,
7 so I'm absolutely for that.

8 Q. Could you then understand
9 why it was that Yvette Schreiber wanted
10 you to put your vest on?

11 A. Well, the thing with that
12 is, again, with my previous vending jobs,
13 if you were to wear a name tag, you can
14 get working that day, and I had my Ideal
15 Merchandising name tag pinned on a
16 solid-colored shirt that says Ideal
17 Merchandising, Will Hanson, Merchandiser,
18 on the bottom.

19 I did the same thing with
20 Spectrum and she never said anything.
21 Spectrum had a really nice name tag. It
22 was hard plastic. This one was just the
23 card and it was hard to read. The one
24 Spectrum had was a hard plastic one and I

WILLIAM HANSON,

1 wore it and she saw me with that
2 frequently, you know, without the vest,
3 and I had to do that because I'm always
4 up and down on the ladder, you know, and
5 the vest could catch on boxes. I'm
6 always up and down the ladder, I'm moving
7 boxes, getting underneath the bays,
8 getting dirty. As long as you had a name
9 tag, it would suffice.

10 I mean, Chris Borzero(ph),
11 the store manager at Wilmington, he said
12 it was okay. I even asked the store
13 manager at Bear at the time and he said
14 it was okay. And I did it in Dover, and
15 I am not saying I asked Yvette's
16 permission, but she did see me without a
17 vest numerous times, so this one time I
18 start with a new company, yes, I don't
19 have any vest, but I have a name tag, and
20 I don't think that would be an issue.
21 For some reason she made it an issue that
22 day. Why she never made it an issue last
23 time, I will never understand, but it was
24 a big issue this time.

WILLIAM HANSON,

1 Q. Do you have any idea whether
2 she as the store manager was required to
3 make sure that vendors had their vests
4 on?

5 A. I don't -- I don't know her
6 job description, sir.

7 Q. The other times that you
8 mentioned that she saw you in the store
9 without your vest on, was it just because
10 you were lifting something or moving
11 product around?

12 A. At the time, I was moving
13 product around.

14 Q. Okay. But on this occasion
15 you didn't even have your vest with you
16 at all, did you?

17 A. Correct, I didn't have my
18 vest with me.

19 Q. And you were not moving
20 product around at the time, you were just
21 there without your vest?

22 A. I was -- at the time when
23 she called out my name, I was moving
24 product around.

WILLIAM HANSON,

1 A. I said, well -- because we
2 had a conversation about it. I told
3 Jeremy there would be times where, you
4 know, I might not have my vest on because
5 I'm going up and down a ladder because
6 there's times you just constantly are
7 going up and down the ladder, and he says
8 that's fine, so I addressed it with him
9 and told him the situation, that Yvette
10 really made a scene, you know, with this
11 vest thing and told me if it happens
12 again I can't come back.

13 He goes, yeah, you know,
14 this -- just try to work with her, you
15 know, because, I mean, he goes to the
16 store without a vest himself. He doesn't
17 always just go in and out. Actually,
18 Jeremy Leaman actually does some work,
19 and he even said it was okay for me to do
20 it, too.

21 Q. He said it was okay for you
22 not to wear your vest to work?

23 A. No, on occasion. Not to do
24 it as a permanent thing, a situation, but

WILLIAM HANSON,

1 there would be times where I would not
2 necessarily have to wear my vest as long
3 as I had a name tag that said I was with
4 Ideal Merchandising.

5 Q. And what you described to me
6 was times when you were moving product
7 around and things like that; is that
8 correct?

9 A. Correct.

10 Q. Did you ever tell him,
11 though, I left the thing at home and
12 that's why Yvette was mad at me?

13 A. I don't even think -- I
14 don't remember the whole extent of the
15 conversation, but I just told him that I
16 didn't see why she wouldn't let me borrow
17 a vest and why it was such a shame. She
18 wanted me to pay for a vest, but I ended
19 up getting one anyway.

20 I did tell him I had to go
21 back home and get one. I was just
22 frustrated with the fact that she made it
23 a big deal and I had to buy one.

24 Q. But he never told you it was

WILLIAM HANSON,

1 okay with him for you not to wear your
2 vest at all and leave it at home, did he?

3 A. He never mentioned anything
4 about that. He didn't reprimand me, if
5 that's what you're asking. He did not
6 reprimand me and said you shouldn't have
7 left it at home, you should have known
8 better.

9 Q. No, what I am asking you is,
10 did he tell you you didn't have to wear
11 the vest, and I don't mean moving product
12 around or climbing up on ladders? Did he
13 tell you you didn't have to wear the vest
14 to work?

15 A. No, he didn't say that.

16 Q. Okay. Is there anybody else
17 you complained to about the vest issue?

18 A. Uhm, I talked to Larry about
19 it. Larry Reed.

20 Q. What did you say to Larry
21 about it?

22 A. I just told him have you
23 seen vendors borrow vests because I don't
24 -- I don't know why she wants me to pay

WILLIAM HANSON,

1 Q. Anybody else that you
2 complained to about the vest?

3 A. No, sir.

4 Q. Okay. What other instances
5 of harassment were you subjected to about
6 Yvette Schreiber?

7 A. Coffee. As a matter of
8 fact, I was drinking coffee. I wasn't
9 exactly at the front door. They have --
10 at the time they had grills. They had a
11 -- do a switch-up on inventory outside.

12 Q. What kind of inventory
13 outside?

14 A. Grills, barbecue grills, and
15 sometimes they will have tractors. I was
16 over by that section, I wasn't even by
17 the front door, and she was really upset
18 that I had coffee so close to the
19 entrance.

20 And I told her that, you
21 know, I can't understand what the big
22 deal is. She goes, it is a big deal. If
23 you're going to drink coffee, you need to
24 drink that coffee in your car.

WILLIAM HANSON,

1 And I said, well, I can't
2 understand it.

3 She goes, you don't need to
4 understand it. You go to your car and
5 finish up that coffee before you come
6 into my store.

7 Q. When you worked as a vendor,
8 were you allowed to eat or drink working
9 in the floor or working actually in the
10 store at Lowe's?

11 A. No, sir, you can't do that.

12 Q. Were you allowed to have
13 food or drink with you in the store?

14 A. I don't see why not, as long
15 as you didn't eat it.

16 Q. I didn't ask your opinion on
17 it. I just want to know, were you
18 allowed to do it?

19 A. I'm sorry. Rephrase the
20 question.

21 Q. Were you allowed to have
22 food or drink with you when you were
23 actually in the store working on the
24 floor?

WILLIAM HANSON,

1 A. No, sir.

2 Q. So you were in the store on
3 the floor and you had coffee with you?

4 A. No, sir.

5 Q. Where you were?

6 A. Outside the store by the
7 barbecue grills.

8 Q. You were about to go inside
9 the store with coffee?

10 A. No, I was outside taking a
11 break with the coffee.

12 Q. So you were not going
13 inside?

14 A. After I was done with the
15 coffee, I was going to go inside.

16 Q. So you were just drinking
17 your coffee outside?

18 A. Right.

19 Q. And Yvette told you that you
20 had to drink the coffee in your car?

21 A. Yes, sir.

22 Q. Not outside the store?

23 A. Correct.

24 Q. Okay. And so what was the

WILLIAM HANSON,

1 thing about not bringing the coffee in to
2 her store? Did she say that to you?

3 A. No, sir.

4 Q. She didn't say don't bring
5 that coffee into my store?

6 A. Correct.

7 Q. She just said go drink the
8 coffee in the car?

9 A. Yes, sir.

10 Q. Did you complain to anybody
11 about that?

12 A. Another vendor, Vernon.

13 Q. Okay. Anybody at Lowe's
14 that you complained to about that?

15 A. Jeff Ramirez.

16 Q. Who is Jeff Ramirez?

17 A. He's the plumbing
18 specialist.

19 Q. What did Jeff say to you?

20 A. He just said he basically
21 knew how she was and he's not surprised
22 that she said that.

23 Q. What do you mean "he knew
24 how she was"?

WILLIAM HANSON,

1 A. I mean, it wasn't like I
2 wouldn't say they had a good rapport or
3 anything.

4 Q. Is he one of the ones who
5 quit because he didn't like Yvette?

6 A. Yes, correct.

7 Q. Okay. Any other instances
8 of harassment that you were subjected to
9 by Yvette Schreiber?

10 A. Probably the ones that I
11 already mentioned. I don't know if you
12 want to go back to it from a different
13 question. That's when I had called the
14 corporate -- corporate office on her. A
15 hostile environment was just more hostile
16 because things did get worse after I
17 called.

18 - - -

19 (Whereupon, Exhibit 4 was
20 marked for identification.)

21 - - -

22 BY MR. LEAHY:

23 Q. Mr. Hanson, I'm showing you
24 Exhibit 4. Have you seen this document

WILLIAM HANSON,

1 before?

2 A. I have never seen this, sir.

3 Q. Why don't you take a second
4 and read through it, and I will point out
5 a couple of things to you. There's a
6 date on there of 12/3/03 --

7 A. Okay.

8 Q. -- and it refers to a -- it
9 begins with vendor states. It says,
10 vendor states that he constantly has
11 run-ins with the store manager, Yvette
12 Schreiber. I would like you to read
13 through this and tell me if this relates
14 to your complaint that you said relates
15 to Lowe's corporate, and we will go off
16 the record to do that, if you want.

17 - - -

18 (Whereupon, there was a
19 discussion held off the record at
20 this time.)

21 - - -

22 (Whereupon, there was a
23 recess held at this time, 2:54 to
24 3:01 p.m.)

WILLIAM HANSON,

1 BY MR. LEAHY:

2 Q. Mr. Hanson, are you ready?

3 A. Yes, sir.

4 Q. Mr. Hanson, looking at this
5 customer care incident fax, does that
6 sound like the complaint that you made,
7 you said, I think, to Lowe's corporate
8 about Yvette Schreiber?

9 A. Yes, sir.

10 Q. Correct?

11 A. Yes, sir.

12 Q. How did you make the
13 complaint, can you tell me physically
14 what it was that you did?

15 A. I, uhm -- I called, uhm,
16 shortly -- it was shortly after the
17 incident I called, and I don't know if
18 they are factoring in a time difference
19 in this or not, but right after the
20 incident I called and I just had -- I
21 called from home and this is basically
22 where I told them that --

23 Q. Back up.

24 Who did you call?

WILLIAM HANSON,

1 A. I called Lowe's corporate
2 office.

3 Q. What did you do, you called
4 the main switchboard or what?

5 A. The number that I had, which
6 I got from the human resources department
7 at Lowe's.

8 Q. Okay. And when did you get
9 it from the human resources department?

10 A. That day.

11 Q. Who did you talk to in human
12 resources?

13 A. I got it from the wall.

14 Q. You got it from the wall
15 outside of the human resources --

16 A. Outside the human resources
17 department.

18 Q. Is this essentially the
19 complaint that you made?

20 A. Yes, sir.

21 Q. Okay. And it says in there
22 that you constantly have run-ins with the
23 store manager, Yvette Schreiber?

24 A. Yes, sir.

WILLIAM HANSON,

1 Q. She always has smart alec
2 comments and makes the work environment
3 very unpleasant and stresses this vendor,
4 that's you; is that correct?

5 A. Can I make a comment?

6 Q. Sure. Well, tell me if
7 that's correct first. Is that the
8 complaint that you made?

9 A. Can you please repeat that?

10 Q. Is that complaint what it
11 says here?

12 A. I'm sorry, what you said
13 before that.

14 Q. She always has smart alec
15 comments and makes the work environment
16 very unpleasant and stresses this vendor.

17 A. Yes, sir.

18 Q. Okay. What was your
19 comment?

20 A. Yeah, this looks like -- I'm
21 not going to say this is what I said
22 verbatim. It looks like the person that
23 I spoke with at the corporate office,
24 that's their interpretation of what I

WILLIAM HANSON,

1 said, I guess like a synopsis. They took
2 everything I said and put it in this
3 paragraph. Those are not the words I
4 would use. I wouldn't use smart alec and
5 I wouldn't use -- there is some stuff in
6 here that I wouldn't say so it's their
7 interpretation of what I told them.

8 Q. Is it accurate? Is it
9 consistent with what you told them?

10 A. Yes, sir.

11 Q. Okay. Is there any part of
12 it that's inaccurate?

13 A. No, sir.

14 Q. Is there anything that they
15 have -- other than you said you wouldn't
16 use the word smart alec, I think, is
17 there anything here that -- anything
18 that's left out from this complaint that
19 you told them?

20 A. No, sir.

21 Q. Did you tell them that it
22 was because you thought it was because of
23 your gender that Yvette Schreiber was
24 doing this to you?

WILLIAM HANSON,

1 didn't see her, you were at the desk?

2 A. Yeah, I didn't see her at
3 first, but when I turned to look she was
4 there.

5 Q. So there was that one time,
6 and when was the other time when she said
7 this place looks like shit; is that what
8 it was?

9 A. She said that, but didn't
10 call me boy.

11 Q. When did she call you boy?

12 A. She called me boy on a
13 couple of occasions. Like one time when
14 I had a shopping cart -- actually, it
15 was, you know, it was a shopping cart,
16 but I guess that was in her way because
17 she was trying to get something, and she
18 said, you got to move this out the way,
19 boy.

20 And there was another
21 incident where I think she just didn't
22 like the way things looked and she
23 assumed that it was my fault that it
24 looked bad, so she goes, you need to do a

WILLIAM HANSON,

1 A. She lied to my boss at Ideal
2 Merchandising.

3 Q. What did she lie to your
4 boss about?

5 A. She told Jeremy Leaman that
6 she didn't call me boy and that she
7 didn't say -- that comment that I called
8 on the care line, that she said none of
9 that happened and she didn't --
10 definitely didn't call me a boy, and I
11 needed to go and apologize to her for
12 calling the care line.

13 Q. And how do you know that she
14 did that?

15 A. Jeremy told me.

16 Q. Any other reasons why you
17 think it was because of your race and
18 your sex?

19 A. Only time -- one -- one time
20 I gave her my business card. There's a
21 group -- when I was market sales manager
22 for Spectrum, there was a group of people
23 there and I didn't want to leave her out
24 of the loop.

WILLIAM HANSON,

1 to get along with them, and in this case,
2 that happens to be the store manager, and
3 I'm just a vendor, but I still -- I just
4 wanted to work things out because I
5 didn't feel like I should have to go to
6 the Lowe's store depressed all time
7 because I feel this is another day where
8 Yvette picks on Will and gets embarrassed
9 in front of everybody.

10 Q. Let's go back to paragraph
11 14 of your complaint, and we were talking
12 about you were subject to constant
13 harassment by store manager Yvette, and
14 the rest of it says, and assistant store
15 manager Linda Myer.

16 A. Yes, sir.

17 Q. Tell me how Linda Myer
18 subjected you to harassment.

19 A. From the very --

20 Q. I should say Myers.

21 A. Myers, yes, that's correct.

22 Starting from the very first
23 day, which I have already mentioned when
24 I almost didn't get the job with Ideal

WILLIAM HANSON,

1 Merchandising, that Jeremy Leaman had got
2 a mysterious call, not to his cell phone,
3 but amazingly at the department that he
4 was at, which was home decor, which I had
5 to do paperwork at, mini blind
6 department, and she would have had to
7 have known exactly where he was at
8 because every department has a different
9 extension.

10 So one of the associates
11 picked up and said, is there a Jeremy
12 here? He goes, yeah, that's me. Got the
13 call from the department and it was -- in
14 a nutshell, after the call, I didn't even
15 ask him anything, and he said that was
16 Linda. Do you know who she is?

17 And I said, yeah. Like I
18 said to you before, that goes through the
19 whole store why she didn't want me to
20 work there.

21 Q. Let me make something clear.
22 Jeremy worked for Ideal; correct?

23 A. Yes, sir.

24 Q. And Ideal serviced plumbing

WILLIAM HANSON,

1 and electrical?

2 A. Yes.

3 Q. So if Linda Myers wanted to
4 know what department he was in, she had
5 two choices, didn't she?

6 A. Yes, sir.

7 Q. Plumbing or electrical?

8 A. Yes, sir.

9 Q. So for her to know what
10 department he was in really didn't take a
11 whole lot of guesswork by her, did it?

12 A. No, it did not.

13 Q. So you told me about that
14 one. What other instances do you feel
15 that you were subjected to harassment by
16 Linda Myers?

17 A. I want to say the
18 chastising, if that's the right word, or
19 the -- I don't know if I am using the
20 right word there, but more -- more like a
21 defamation type of situation because she
22 was telling various people that she
23 didn't want me -- I mean, and she
24 shouldn't do that, being she's in

WILLIAM HANSON,

1 management, telling various people that
2 she didn't want me to work for Ideal
3 Merchandising.

4 Q. Who did she tell?

5 A. Everybody. She told Larry,
6 Thelma, uhm, Juanita. Uhm, probably a
7 couple people, but I can't think of their
8 names right now, but that goes back to
9 what I was telling you before, that she
10 felt that I was responsible for her son
11 getting terminated and that she didn't
12 want me to take over after her son.

13 Q. Why do you think that was
14 the reason? I know you told me before,
15 but I apologize, because I don't recall.

16 A. Her dislike for me.

17 Q. I'm sorry, that was why she
18 felt that you were responsible, for you
19 getting her son terminated?

20 A. No, sir. I don't know why
21 she felt that I was -- I guess she felt
22 that it was so soon, because when I took
23 over, it wasn't that long after her son
24 got terminated, we are talking maybe

WILLIAM HANSON,

1 about a month, and so it's not like there
2 was this big gap where nobody serviced
3 plumbing and electrical. Shortly
4 thereafter I was hired, and I guess
5 because it was so fast that they hired
6 someone, she probably felt I was
7 responsible for getting her son
8 terminated, which wasn't the case because
9 I don't even know her son.

10 Q. That's your own speculation
11 on that, though, not something somebody
12 told you?

13 A. That's something from Larry,
14 Joe, Juanita and, like I said, a couple
15 of other people I can't even think about.

16 Q. Okay. And any other ways in
17 which you were harassed by Linda Myers?

18 A. I can't -- I can't prove it,
19 though.

20 Q. Well, tell me.

21 A. I believe -- see, it's -- I
22 don't know if she --

23 Q. Proving your case is your
24 attorney's job right now, so I'm sure he

WILLIAM HANSON,

1 Q. And how did you know that he
2 gave the tape to Linda?

3 A. I don't know.

4 Q. Okay. You only know that
5 somehow Linda contacted Jeremy Leaman; is
6 that correct?

7 A. Yes, sir.

8 Q. And told Jeremy that you had
9 been tape recording conversations in the
10 store?

11 A. That's correct.

12 Q. Okay. Now, can you
13 understand why Linda Myers would think
14 that you had been tape recording
15 conversations in the store, having heard
16 that tape?

17 A. Yes, sir.

18 Q. Okay. Because you actually
19 did record a conversation between you and
20 Carlos Vazquez, didn't you?

21 A. That was unintentional.

22 Q. But you did do it, didn't
23 you?

24 A. It's recorded, but it was

WILLIAM HANSON,

1 unintentional.

2 Q. But you did record it,
3 didn't you?

4 A. If you're going to ask me in
5 that manner, I would have to say yes.

6 Q. Thank you.

7 From your standpoint, is it
8 reasonable for Linda Myers, then, to say
9 that there were tape recording
10 conversations in the Lowe's store?

11 A. Not necessarily.

12 Q. No? But you had, in fact,
13 recorded them, or at least recorded a
14 conversation?

15 A. Yes, sir.

16 Q. Okay.

17 - - -

18 (Whereupon, Exhibit 8 was
19 marked for identification.)

20 - - -

21 BY MR. LEAHY:

22 Q. Mr. Hanson, I'm showing you
23 now what we have marked as Exhibit 8. It
24 is a policy from Lowe's Human Resources

WILLIAM HANSON,

1 Management Guide entitled Prohibition Of
2 Recording Equipment Use.

3 Have you ever seen this
4 policy before?

5 A. No, sir.

6 Q. Okay. Were you aware that
7 Lowe's maintained a policy with this
8 title?

9 A. No, sir.

10 Q. Okay. I would like to run
11 through a little bit of the policy with
12 you and, if you would, look -- actually,
13 would you like to take a minute and read
14 it to yourself?

15 A. You can highlight what you
16 want to say.

17 Q. That's fine.

18 Let's look at paragraph B.
19 Do you see where it says, consequently,
20 Lowe's prohibits employees from using any
21 recording device on company property,
22 including audio, video and still
23 photography.

24 So under this policy,

WILLIAM HANSON,

1 Lowe's, as you can read there, prohibits
2 employees from doing that kind of stuff
3 and --

4 Were you actually using a
5 recording device on Lowe's property?

6 A. Yes, sir.

7 Q. Okay. I would like you to
8 look down at letter D. Do you see where
9 it says no employee or other individual
10 may openly or secretly tape or otherwise
11 record or videotape any conversation,
12 communication, activity, or event that in
13 any way involves the company, the
14 employees of the company, any of the
15 company's subsidiaries or affiliates, any
16 customers or clients, or any other
17 individual with whom the company is doing
18 business or intending to do business in
19 any capacity.

20 Do you see that one?

21 A. Yes, sir.

22 Q. What you were doing with
23 that tape violated that, didn't it?

24 MR. PRIMOS: Objection to

WILLIAM HANSON,

1 the form.

2 MR. LEAHY: You can answer.

3 MR. PRIMOS: You can answer.

4 THE WITNESS: According to
5 this, correct.

6 MR. LEAHY: Why don't we
7 take a break now.

8 MR. PRIMOS: That's fine.

9 - - -

10 (Whereupon, there was a
11 recess held at this time, 4:47 to
12 4:58 p.m.)

13 - - -

14 (Whereupon, Exhibit 9 was
15 marked for identification.)

16 - - -

17 BY MR. LEAHY:

18 Q. Mr. Hanson, I'm showing you
19 now what we have marked as Exhibit Number
20 9. Have you seen this document before?

21 A. Yes, sir.

22 Q. Can you tell me what it is?

23 A. The documentation for my
24 tenure with Ideal Merchandising.

WILLIAM HANSON,

1 BY MS. CLEMONS:

2 Q. Okay. Now, one of the
3 things that you have talked about today
4 in depth, and I am afraid because it's
5 been a long day, but it appears to me
6 that you gave at least some contradictory
7 testimony on one point and I want to
8 clear it up and it has to do with your
9 conversations with Mr. Leaman. Okay?

10 So I want to talk about the
11 conversations that you had with Mr.
12 Leaman -- well, I believe you said there
13 were two conversations shortly after you
14 called the customer care line --

15 A. Correct.

16 Q. -- about Yvette?

17 A. Yes, ma'am.

18 Q. Correct?

19 A. Yes, ma'am.

20 Q. So I would like for you to
21 tell me about the first conversation you
22 had with Mr. Leaman.

23 A. The first conversation was
24 right after I called the care line.

WILLIAM HANSON,

1 Q. When you say "right after,"
2 do you mean within minutes or the same
3 day?

4 A. The same day, the same day.

5 Q. Okay. Okay. And so the
6 phone rings. He says hello. You say?

7 A. Yeah, and I said, Jeremy, I
8 called the care line on the store
9 manager, Yvette.

10 Q. And he said?

11 A. And he goes, what happened?
12 Well, I said, uhm, broke the
13 straw -- I'm not going to remember
14 verbatim, but basically that she just
15 said, are you going to do any work today,
16 boy, just like what's been said, and
17 that's right, yeah, that's right, I'm
18 talking to you, boy, and I just said I
19 can't take it no more.

20 Q. And what did he say in
21 response to that?

22 A. He goes, you know, well, you
23 know, you should have called me.

24 Well, I said, I am calling

WILLIAM HANSON,

1 you.

2 He said, well, you should
3 have called me before you called the care
4 line.

5 And I said, well, I didn't
6 know that.

7 Q. Okay. And you said I don't
8 know that, and then he said?

9 A. Well, he goes -- well,
10 actually, it's what I said after that. I
11 said, don't be surprised if you get a
12 call from Lowe's or Yvette herself. I
13 just wanted to let you know.

14 Q. Okay. And he said?

15 A. He said, well, like I
16 appreciate you giving me feedback,
17 something to that extent, give me
18 feedback to let me know what's going on
19 and he just said he will talk to me
20 later.

21 Q. All right. Is there -- I
22 don't mean verbatim, but is there any
23 other substance that happened in that
24 conversation that you didn't just tell

WILLIAM HANSON,

1 me?

2 A. The substance was the next
3 day when I talked to him. There was
4 really no substance in this call.

5 Q. So this was a short phone
6 call?

7 A. It was short, brief.

8 Q. Okay. So then the next
9 phone call you had with him, you said it
10 was the next day?

11 A. Correct, the very next day.

12 Q. Okay. And he called you or
13 you called him?

14 A. He called me.

15 Q. Okay. And the phone rings,
16 you say hello?

17 A. Right.

18 Q. He says?

19 A. He says, yeah, I just spoke
20 with Yvette and, yeah, definitely next
21 time, if it happens, go through me and
22 not the care line.

23 Q. And he said the next time it
24 or did he talk about what the incident

WILLIAM HANSON,

1 was or he just said the next time it
2 happened?

3 A. See, like I said, it's tough
4 to say verbatim, but the next time
5 anything -- because he could have said it
6 or anything happens, just make sure you
7 go through me first and call me first.

8 Q. Before we go on in that
9 conversation, I want to go back.

10 The only thing you told him
11 about the previous day was that she said
12 hey -- or the boy conversation?

13 A. Correct.

14 Q. So he said the next time
15 anything happens, you should go through
16 me first?

17 A. Correct.

18 Q. Then you said?

19 A. And then I said, uhm, --
20 well, actually, this is what he said. He
21 said that Yvette wants an apology and she
22 wants you to, you know, report to her and
23 apologize.

24 Then basically I said, I'm

WILLIAM HANSON,

1 sorry, Jeremy, I can't do that. She did
2 say that and I am not going to apologize
3 for what she said.

4 Q. Okay.

5 A. Then he said, well, it is
6 just like a he said/she said right now,
7 and if that happens again or anything
8 happens again, something to that extent,
9 to like make sure you go through me first
10 and call me.

11 Q. Is there anything else
12 during that conversation that you haven't
13 told me about substantively?

14 A. Uhm, that will be it.

15 Q. I'm going to ask you some
16 questions because that's not what you
17 testified to before. You said some other
18 things, so I'm going to ask you some
19 questions about that.

20 A. Sure.

21 Q. Now, did anything -- did you
22 talk at all about a tape recorder during
23 that conversation?

24 A. Oh, yes, I did. I did leave

WILLIAM HANSON,

1 something out.

2 He mentioned it, Jeremy
3 Leaman mentioned it, and that's one thing
4 I left out, that, you know, right after
5 he said it's basically like a he said/she
6 said, the only way you can really get
7 anything out of it is by having the
8 conversation recorded.

9 Q. Okay.

10 A. Tape recorder, by that
11 means.

12 Q. So he said something to the
13 effect of the only way that you can prove
14 this is by tape recording the
15 conversation?

16 A. Correct.

17 Q. So what did that mean to
18 you? How did you interpret that?

19 A. Well, he knew I had a tape
20 recorder because I was using it for work
21 and I told him that I wasn't going to do
22 that, and I'm just addressing what the
23 concerns was, that I wanted to get it
24 rectified.

WILLIAM HANSON,

1 Q. Okay. And so in response to
2 his comment to the extent of the only way
3 to prove it is to have a tape recorder,
4 you said I'm not going to do that?

5 A. That's correct.

6 Q. Okay. Do you remember what
7 he said after that?

8 A. No, because he kind of -- he
9 said it nonchalantly. I don't -- it
10 wasn't like serious to me. It's
11 nonchalant, he said/she said, and the
12 only way you can get that is with a tape
13 recorder, and we are not going to talk
14 about that.

15 And I said, yeah, it's not
16 something I'm going to, I am not going to
17 do that.

18 Then he said, if anything
19 happens or -- just go through me. And
20 that was then the end of the
21 conversation.

22 Q. Okay. Did you tell him
23 anything else about the incident that you
24 didn't tell me already?

WILLIAM HANSON,

1 A. About the call?

2 Q. No, about the -- about what
3 you were complaining about. You had made
4 a complaint to the customer care line.
5 You called him the previous day -- and if
6 anything that I say is incorrect, correct
7 me.

8 A. Okay.

9 Q. And you said that Yvette
10 made these comments to me?

11 A. Correct.

12 Q. Okay? And he said, you
13 should have called me first, and that was
14 pretty much the end of it, and then the
15 next day you have this conversation where
16 he says, I spoke to her, right?

17 A. Correct.

18 Q. She says she didn't say it
19 and she wants an apology?

20 A. Correct.

21 Q. And he says, it's a he
22 said/she said, and that's the only way,
23 you know -- he makes a comment that the
24 only way is if you have it tape recorded,

WILLIAM HANSON,

1 and you said I'm not going to do that,
2 and he said, if anything happens, call me
3 first, right?

4 A. Right.

5 Q. Okay. Is there anything
6 else in that -- substantively in that
7 conversation?

8 A. The second conversation was
9 a long conversation.

10 Q. Okay.

11 A. So, I mean, I know I'm going
12 to leave things out, just like I left out
13 the tape recorded one, but all I can say
14 is the second conversation was a long
15 conversation. He said a lot. So I
16 probably am leaving some things out.

17 Q. Okay. Did you tell Mr.
18 Leaman why you thought that Yvette said
19 what she said?

20 A. He said -- he -- he said --
21 all I remember from the gist of that
22 conversation was that she said to him
23 that she didn't say any of that, she
24 didn't say she called me boy or anything.

WILLIAM HANSON,

1 And then my rebuttal to Leaman was that
2 she did say it, she was wrong, and I am
3 not going to apologize for her -- to her.

4 Q. Did race or sex ever come up
5 in that conversation?

6 A. I told him I was being
7 treated unfairly.

8 Q. I understand that, but did
9 you say -- I'm asking, did the term race
10 or sex or national origin get used in
11 that conversation?

12 A. It probably did, but like I
13 said, that was a long conversation.

14 Q. And so are you saying you
15 don't recall if it did come up?

16 A. I know I -- I told him that
17 I was being treated unfairly.

18 Q. You remember using the term
19 unfairly or some words to that -- and,
20 really, I'm not trying to hamstring you
21 here, but I just want to really try to
22 understand what terms you used.

23 A. I just don't want to come
24 out and say that I said this particular

WILLIAM HANSON,

1 word or that particular word because I'm
2 trying to be as accurate as I can.

3 All I can say is -- is that
4 I told him that I'm not going to
5 apologize to you, that I told her that --
6 I told him that I was being treated
7 unfairly and I don't know what the reason
8 would be, and I could have said it could
9 have been because of my gender, and I
10 could have easily said that, but we said
11 a lot.

12 He said actually more than I
13 did, but what I said was just as much
14 and, uhm, this was basically like just
15 being unhappy with the outcome of the
16 call. She wanted an apology and I wasn't
17 going to give it.

18 Q. Okay. And is it fair to say
19 that you don't remember or recall if you
20 said the terms race or sex or national
21 origin or any of those things came up in
22 the conversation?

23 A. Yeah, I'm not comfortable
24 with saying I said those terms, per se --

WILLIAM HANSON,

1 Q. Okay.

2 A. -- because there was a lot
3 said. I do know that I said I don't feel
4 like I'm treated fair. I know I said
5 something to that extent, but I'm not
6 comfortable just saying, hey, you know,
7 it's because of this, this and that, you
8 know.

9 Q. So you don't remember if you
10 told him you thought that you were being
11 unfairly on that basis?

12 A. I'm not comfortable saying
13 that I did because a lot was said that
14 night.

15 Q. Okay. Do you know if Mr.
16 Leaman knew what your race or national
17 origin is?

18 A. Yes.

19 Q. How do you know that?

20 A. He asked me.

21 Q. He asked you?

22 A. Uh-huh.

23 Q. And told him?

24 A. Well, I would say usually

WILLIAM HANSON,

1 the same thing, that I'm just half
2 Korean.

3 Q. Okay. Now, other than these
4 two conversations where you reported to
5 Mr. Leaman the incident with Yvette, the
6 boy comment, did you ever have any other
7 conversations or complaints that you made
8 to Mr. Leaman or anyone else at Ideal
9 about your treatment while you were
10 working at the Dover Lowe's?

11 MR. PRIMOS: Same objection
12 as before. I believe that's been
13 asked and answered, but you can
14 answer.

15 THE WITNESS: Well, it's a
16 -- basically, the first day, as I
17 mentioned, the first day I almost
18 didn't get hired.

19 MS. CLEMONS: Okay.

20 BY MS. CLEMONS:

21 Q. So you covered that
22 thoroughly, the first-day conversation
23 wherein we are talking about you saying
24 Mr. Leaman got a call from Yvette and he

WILLIAM HANSON,

1 told you that she said she didn't want
2 you working there?

3 A. He actually got a call from
4 Linda Myers.

5 Q. Linda Myers, I apologize,
6 okay.

7 Are there any other
8 complaints that --

9 Did you report any other
10 issues to Mr. Leaman that you haven't
11 told me about?

12 A. Yes.

13 Q. Okay. What was that?

14 A. That I had trouble with
15 Yvette when I was a vendor working for
16 Spectrum.

17 Q. When did you have that
18 conversation with Mr. Leaman?

19 A. When I met him at Middletown
20 before I got hired.

21 Q. Before you got hired?

22 A. Uh-huh.

23 Q. Tell me about that
24 conversation.

WILLIAM HANSON,

1 A. Well, I just told him that,
2 you know -- I just said Yvette, like
3 she's the store manager in Dover, as you
4 already know, and I had problems with her
5 when I was a vendor before. Is this
6 going to be a problem with me -- you
7 know, with me doing my job?

8 He basically just said,
9 don't worry about it, you know, basically
10 deal directly through me, and if you deal
11 with anybody, it will be the department
12 managers because they are the ones that
13 know what's going on in the department
14 and they are the ones that will sign you
15 out on your PDA.

16 Q. Did you explain to him what
17 your problems were with Yvette?

18 A. Just not getting any
19 cooperation, uhm --

20 Q. Is this what you told him?

21 A. Yes.

22 Q. Okay. Go ahead.

23 A. Basically just not getting
24 any cooperation and, uhm, just had --

WILLIAM HANSON,

1 just it was very difficult for me to deal
2 with Yvette.

3 Q. Okay. Well, did you give
4 him any specific examples, or was it kind
5 of she's not cooperating with me, you
6 know, the things you just said?

7 A. No, I didn't go into details
8 with him. I just said -- I just
9 mentioned that -- briefly that, you know,
10 this is it, and, this is the story and
11 basically it is hard for me to deal with
12 Yvette on a -- on a business level.

13 Q. Okay. Are there any other
14 conversations that you had with Mr.
15 Leaman about anything that you
16 experienced at the Dover store?

17 A. No, ma'am.

18 Q. Did you ever complain to Mr.
19 Leaman about Carlos Vazquez?

20 A. No, ma'am.

21 Q. Now, I understand that you
22 previously testified that Mr. Leaman is
23 the one who called you and told you that
24 your employment was terminated with

WILLIAM HANSON,

1 Ideal?

2 A. Correct.

3 Q. Did he tell you who made the
4 decision within Ideal to terminate your
5 employment?

6 A. Who made the decision within
7 Ideal?

8 Q. Yes.

9 A. No, ma'am.

10 Q. Okay. Did anyone ever tell
11 you who decided to terminate you within
12 Ideal?

13 A. No, ma'am.

14 Q. And I promise I won't
15 torture you much longer, but I want to
16 kind of pick up with the same thing I did
17 with other calls you had with Jeremy
18 Leaman about this last call.

19 The phone rings. It's
20 Sunday afternoon. You said hello. And
21 he says?

22 A. He just said, uhm, man -- I
23 mean, I remember the conversation, but
24 what he said -- I mean, it's not like he

WILLIAM HANSON,

1 said you are terminated right off the
2 bat.

3 He caught me off guard that
4 he called me on Sunday. I don't usually
5 get a call on a Sunday from him, just
6 basically, uhm, uhm, you know -- that's
7 probably why I get called twice, because
8 I asked him to check into a -- just
9 basically like what's going on in the
10 Dover store. I'm understanding that, you
11 know, they don't want you back in the
12 Dover store.

13 I said -- I said, why, what
14 happened? Uhm, like who said that?

15 He said Linda Myers. He --
16 he was hesitant, but he did say the name.
17 He did tell me that it was Linda who said
18 that to him.

19 Q. He said what's going on
20 basically, I am getting some reports,
21 Linda Myers doesn't want you back to the
22 Dover store?

23 A. That's correct.

24 Q. And so then you said in

WILLIAM HANSON,

1 response to that?

2 A. Well, what I said -- I like
3 to -- like I made a statement earlier
4 that I would like to, uhm, change because
5 what I said after that was -- I was
6 talking about whether or not I could
7 still work in Middletown, but that's not
8 -- I did say that, but I didn't say that
9 after he said I can go back to the Dover
10 store. What I asked him was the reason,
11 so I did make a mistake earlier on that.

12 Q. That's okay.

13 A. Yeah, so he just said, you
14 know, there's conversations recorded.
15 And I told him, you know, I have a tape
16 recorder and you know what I use it for.
17 I said, that's nonsense. Can you please
18 call back? Yvette has the final call on
19 that, and I don't know, I don't have a
20 rapport with Yvette, but I just wanted to
21 just -- just for him to get at least it
22 from her, you know.

23 Q. So I'm going to just back
24 you up a little bit.

WILLIAM HANSON,

1 He said she doesn't want you
2 back. You asked why. He said Linda told
3 him that you have recorded conversations
4 in the store?

5 A. That's correct.

6 Q. And you said that's
7 nonsense, Yvette has the final say on
8 that, would you please call her and, you
9 know, check on this?

10 A. That's correct.

11 Q. Was that a correct
12 paraphrasing of it?

13 A. Yes, that's a correct
14 paraphrasing.

15 He did call me back in a
16 timely manner. He did call back.

17 Q. Before you go to the next
18 conversation, I'm sorry, was there
19 anything else in that first time he
20 talked?

21 A. Uhm, I think that was I
22 told -- just right after about the
23 nonsense and, you know, the -- Yvette,
24 you know, to find out from her, and I

WILLIAM HANSON,

1 know I don't have a rapport with her, but
2 I just know that she makes that decision.

3 And Jeremy did call me back
4 in a timely manner. He called me
5 practically right away, and I don't think
6 he spoke directly with Yvette, but Linda,
7 I don't know if she called Yvette or she
8 already had the nod from Yvette, but she
9 already had something for Yvette for
10 Linda to say to Jeremy, Linda said it's a
11 go and he is not to report back to this
12 store.

13 That's when I asked, well --
14 so that's Dover. I said what about
15 Middletown?

16 He goes, uhm, what about --
17 because I'm thinking about how am I going
18 to pay my bills at that time? I can't
19 really be just out of a job.

20 And he was just like, well,
21 there is no part time.

22 I mean, I'm like what do you
23 mean? Because when I first started he
24 told me there was a part-time associate

WILLIAM HANSON,

1 in Middletown Lowe's so I thought maybe I
2 could stay there. Middletown didn't have
3 a problem with me.

4 He goes there is no part
5 time. He goes -- you are --

6 And he was very -- he was
7 very careful with, you know, just what he
8 said and stuff. I mean, he was kind of
9 you know, introverted and he basically
10 took his time, so he was really just
11 calm, just like, you know, you know, it
12 happened, you know, there is no part
13 time, you won't be able to go to
14 Middletown, uhm, you know, we are going
15 to have to meet up next week and I will
16 have to get your PDA back, your camera,
17 uhm, PDA, camera, and something else.

18 And I said that's not going
19 to be problem, I will return everything
20 to you. And that's another reason why I
21 didn't think the tape recorder was a
22 problem, because I was taking pictures of
23 everything and I had my PDA, my camera,
24 my tape recorder, and Ideal issued me the

WILLIAM HANSON,

1 camera and PDA, so I didn't see it being
2 a big deal, but he did get everything the
3 following week. I returned everything to
4 him. And he -- and he just wished me
5 luck on my endeavors and -- it wasn't on
6 bad terms.

7 I just, you know, said,
8 well, you know, I don't know what to do
9 at this stage, but, you know, just have a
10 nice day, and that was it.

11 Q. It sounds like Mr. Leaman
12 was nice to you?

13 A. He was nice to me.

14 Q. Okay. And that you had a
15 rapport with him.

16 A. I had a rapport with him.

17 Q. Did you believe that Mr.
18 Leaman discriminated against you based on
19 your sex or race or national origin?

20 A. No.

21 MS. CLEMONS: Can we go off
22 the record for ten seconds? I may
23 be done.

24 MR. PRIMOS: That's fine.